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We are responding to your letter dated April 15, 2015 regarding Workers? Voice?s (?the Committee?s?) 2014 Amended 30-Day

Post-General Report (?Post-General Report?).

We first address certain payments made to New Partners Consulting, Inc. (?New Partners?) that you list in your letter as either costs that the Committee failed to disclose in a 24-Hour Report or that the Committee failed to itemize on its Post-General Report after reporting on a 24-Hour Report. These costs relate to digital advertisements the Committee engaged New Partners to design and place. As we will explain in greater detail below, the vast majority of these costs should not have been reported by the Committee as independent expenditures, as the ads did not contain express advocacy;

reports that were not required cannot be filed late. Additionally, due to the unique nature of digital advertising, the Committee was dependent on its vendor to timely provide cost information, and information about the independent expenditure advertisements was not provided in time to timely disclose them.

Your letter identifies payments made to New Partners on October 28, 29, 30, and 31 for ads concerning candidate Mitch McConnell that the Committee disclosed in its Post-General Report but did not disclose on a 24-Hour Report. The costs for these four days of ads total \$14,949.52. These costs were for a series of five digital ads addressing Senator McConnell?s connection to various issues and special interests. Upon review, these ads did not constitute independent expenditures, since they did not contain express advocacy against Senator McConnell as a candidate for reelection. The Committee inadvertently reported these online ads as independent expenditures in its Post-General Report. We will amend that Report accordingly. For this reason no 24-Hour Reports were due and no further action should be taken by the Commission regarding these payments.

Your letter also identifies two payments to New Partners for ads concerning candidate Mark Begich that the Committee respectively disclosed on an October 25 and October 30 24-Hour Report that were not itemized on Schedule E of the Post-General Report. These payments total \$,4393.75. These ads were inadvertently reported as independent expenditures. In fact, these were get-out-the-vote advertisements that encouraged voters to use Alaska?s online voting option and did not refer to any candidate. Prior to filing the Post-General Report, these ads were reviewed and the Committee realized that they were not independent expenditures, so they were not itemized on the Post-General Report. The Committee is ready to amend the 24-Hour Reports to remove these two reported payments, if requested to do so. But the Commission should take no further action otherwise regarding these payments.

Lastly on digital ads, your letter lists payments to New Partners for ads in support of Begich during October 25-31. These payments total \$571.39. To understand why the Committee did not timely report these costs on 24-Hour Reports, it is important to understand how costs are calculated for digital ads.

The cost calculation for these digital ads ? critical to assembling and timely filing an independent expenditure report ? differs markedly from broadcast ads. The cost of broadcast ads is known at the time an ad buy is made, making it predictable and easy to report in short time frames. The digital ad costs here (which are typical of digital ads overall) did not work the same way. Digital ads run 24 hours a day, and the costs of those ads accrue as they are clicked on by viewers. The cost per click constantly fluctuates, and is determined by an on-going auction/bid process. It is therefore impossible to know a digital ad?s cost for a day until after that day has ended.

The Committee contracted with New Partners to help develop and place digital ads. The vendor agreed to supply the Committee with the daily cost

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